

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

JOSEPH MUNDY,

Plaintiff,

v.

**LIFE INSURANCE COMPANY OF
NORTH AMERICA, in its capacity as
Administrator of the Yellow Roadway
Corporation Long-Term Disability Benefits
Plan, YELLOW ROADWAY
CORPORATION LONG-TERM
DISABILITY BENEFITS PLAN, YELLOW
TRANSPORTATION, INC.**

Defendants.

Case No.: 08 C 1576

Judge Bucklo

Magistrate Judge Valdez

AGREED MOTION FOR EXTENSION OF TIME

Defendants, LIFE INSURANCE COMPANY OF NORTH AMERICA (“LINA”), and YELLOW ROADWAY CORPORATION LONG-TERM DISABILITY INSURANCE PLAN (“LTD Plan”), by their undersigned counsel, respectfully move this Honorable Court for a seven day extension of time, from August 12, 2008 to August 19, 2008, to respond to plaintiff’s motion for leave to conduct discovery:

1. The response of LINA and the LTD Plan to the plaintiff’s motion for leave to conduct discovery (Docket # 49) is due August 12, 2008. Counsel for defendants spent all of the week of August 4, 2008 preparing for and taking expert depositions in an earlier filed case. As a result, counsel have been unable to complete the response brief and obtain defendants’ comments on the brief by the current deadline. Defendants therefore seek a seven day extension, from August 12 to August 19, to file their response to the motion for leave to conduct discovery.

2. In an email exchange on August 12, 2008, counsel for the plaintiff and the co-defendant, Yellow Roadway Corporation, stated they did not oppose this motion.

WHEREFORE, Defendants, LIFE INSURANCE COMPANY OF NORTH AMERICA, and YELLOW ROADWAY CORPORATION LONG-TERM DISABILITY INSURANCE PLAN, respectfully request that this Honorable Court grant them a seven day extension, up to August 19, 2008, to respond to plaintiff's motion for leave to conduct discovery.

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Respectfully submitted:

LIFE INSURANCE COMPANY OF NORTH
AMERICA and YELLOW ROADWAY
CORPORATION LONG-TERM
DISABILITY INSURANCE PLAN

By: /s/ Peter E. Pederson
One of its Attorneys

CERTIFICATE OF SERVICE

I, the undersigned attorney, certify that on August 12, 2008, I e-filed this motion using the Court's CM/ECF system, which will make a copy available to counsel of record identified below.

s/Peter E. Pederson

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